

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<p><b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b></p> <p><b>GENOVA BURNS LLC</b>  Daniel M. Stolz, Esq.  Donald W. Clarke, Esq.  Matthew I.W. Baker, Esq.  dstolz@genovaburns.com  dclarke@genovaburns.com  mbaker@genovaburns.com  110 Allen Road, Suite 304  Basking Ridge, NJ 07920  Tel: (973) 467-2700  Fax: (973) 467-8126  <i>Proposed Local Counsel to the Official Committee of Talc Claimants</i></p>	<p><b>BROWN RUDNICK LLP</b>  David J. Molton, Esq.  Robert J. Stark, Esq.  Michael Winograd, Esq.  Eric R. Goodman, Esq.  dmolton@brownrudnick.com  rstark@brownrudnick.com  mwinograd@brownrudnick.com  egoodman@brownrudnick.com  Seven Times Square  New York, NY 10036  Tel: (212) 209-4800  Fax: (212) 209-4801</p> <p>and</p> <p>Jeffrey L. Jonas, Esq.  Sunni P. Beville, Esq.  jjonas@brownrudnick.com  sbeville@brownrudnick.com  One Financial Center  Boston, MA 02111  Tel: (617) 856-8200  Fax: (617) 856-8201  <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>
<p><b>MASSEY &amp; GAIL LLP</b>  Jonathan S. Massey, Esq.  Rachel S. Morse, Esq.  jmassey@masseygail.com  rmorse@masseygail.com  100 Main Ave. SW, Suite 450  Washington, DC 20024  Tel: (202) 652-4511  Fax: (312) 379-0467  <i>Proposed Special Counsel for the Official Committee of Talc Claimants</i></p>	<p><b>OTTERBOURG PC</b>  Melanie L. Cyganowski, Esq.  Richard G. Haddad, Esq.  Adam C. Silverstein, Esq.  Jennifer S. Feeney, Esq.  David A. Castleman, Esq.  mcyganowski@otterbourg.com  rhaddad@otterbourg.com  asilverstein@otterbourg.com  jfeeney@otterbourg.com  dcastleman@otterbourg.com  230 Park Avenue  New York, NY 10169  Tel: (212) 905-3628  Fax: (212) 682-6104  <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>

In Re:

**LTL MANAGEMENT, LLC,**

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**FIRST SUPPLEMENTAL CERTIFICATION OF MATTHEW DIAZ  
IN SUPPORT OF APPLICATION FOR RETENTION  
OF FTI CONSULTING, INC. AS FINANCIAL ADVISOR FOR THE  
OFFICIAL COMMITTEE OF TALC CLAIMANTS EFFECTIVE APRIL 15, 2023**

I, Matthew Diaz, being of full age, certify as follows:

1. I am a senior managing director at FTI Consulting, Inc. (“FTI”). I submit this certification to supplement the disclosures made in the certification<sup>1</sup> in support of the application [Dkt. No. 539] (the “Application”)<sup>2</sup> to retain FTI as financial advisor to the Official Committee of Talc Claimants of LTL Management LLC (the “Committee”).

2. This supplemental certification (“Supplemental Certification”) adds additional information and disclosures in response to inquiries received from the U.S. Trustee’s office but does not supersede the disclosures or connections set forth in the Application and Certification unless expressly stated otherwise herein.

3. In Exhibit C to the Certification, the U.S. Trustee asked FTI to clarify, which clients are former and current. As such, FTI has amended Exhibit C to include such information, a copy of which is attached to this Supplemental Certification as **Amended Exhibit C**. In addition to distinguishing between recent former or current clients, Amended Exhibit C also includes information regarding whether each current client’s revenue exceeded 1% of FTI’s gross revenue

---

<sup>1</sup> *Certification of Matthew Diaz in Support of Application for Retention of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Talc Claimants Effective April 15, 2023* [Dkt. No. 539-1] (the “Certification”).

<sup>2</sup> Capitalized terms used herein not otherwise defined have the meaning given to them in the Application or Certification, as applicable.

for the years ended December 31, 2021 and December 31, 2022. Amended Exhibit C replaces and supersedes Exhibit C to the Certification. Of note, the vast majority of FTI's engagements are situations where a particular law firm engages FTI or one of its subsidiaries to perform services for the end client, *e.g.*, provide financial advisory services, electronic discovery services, expert witness services, etc., in furtherance of the law firm's representation of the end client. In most of these situations, the law firm will engage FTI or a subsidiary on behalf of the end client, the end client will pay the invoices, and the revenue from the matter will be attributed to the law firm. For the avoidance of doubt, both the end client and law firm are recorded as clients in FTI's client database. As such, revenue from a myriad of clients is aggregated and attributed to the applicable law firm.

4. For the year ending December 31, 2022, one law firm on Exhibit C, Covington & Burling, LLP ("Covington"), was attributed revenue from the end clients (dozens of clients) that, when aggregated, exceeded 1% of FTI's revenue. (When broken down by actual end client, revenue from each individual end client was less than 1% of FTI's revenue.)

5. In addition, the U.S. Trustee's office also requested that FTI identify the professionals and their respective rates for the professionals working on behalf of the Committee. Although the FTI professionals working on behalf of the Committee are subject to change,<sup>3</sup> as of the date hereof, the current FTI professionals working on behalf of the Committee are as follows:

---

<sup>3</sup> Going forward, the FTI professionals and their respective rates currently working on behalf of the Committee may be seen in FTI's fee applications filed with the Court.

<i><b>FTI Professional</b></i>	<i><b>Current Hourly Rate</b></i>
<i><b>Restructuring</b></i>	
Diaz, Matthew	\$1,325
Tully, Conor	1,325
Berkin, Michael	1,055
Khan, Baber	925
Eisenberg, Jacob	695
Scheff, William	475
<i><b>Strategic Communications</b></i>	
Staples Miller, Citseko	\$875
Thalassinos, Angelo	875
Labkoff, Nicole	650
Negron, Sabrina	650
Weltman, Allison	525
<i><b>Economics</b></i>	
Heeb, Randal	\$1,410
Austin Smith, Yvette	1,250
Watson, Ching	1,210
Kubali, Volkan	1,025
Rinaudo, Alex	950
Polonsky, Jonathan	950
Waye Azuero, Brandon	650
Tai, Nikki	510

6. Based on the Certification and this supplemental certification, to the best of my knowledge, FTI does not hold or represent any interest adverse to the estate, and therefore believes it is eligible to represent the Committee under Bankruptcy Code section 1103(b).

I certify under penalty of perjury that the above information is true and correct.

Date: May 31, 2023

/s/ Matt Diaz  
Matthew Diaz